

**Canel v. Norh Shore Gas 08-0562**

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**From:** gateofhorn@earthlink.net  
**To:** mlglawoffices@aol.com  
**Subject:** Canel v. Norh Shore Gas 08-0562  
**Date:** Jan 12, 2009 1:04 PM

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Dear Mr. Goldstein, First with respect to your response the section 237 notice served upon the Respondent, the respondent's objection to the production of Nichole Cutler, and Mr. Arce at hearing is without a bases in law or fact. Both witnesses are directly involved in the facts of this case and the issues in controversy between the parties. Sup. Ct. R 237 (b) controls the respondent's obligation to produce them at hearing. I will seek of enforcement and appropriate sanctions should the respondent fail to produce each and every witness at hearing in response to the 237 notice served upon the respondent. It is not for the respondent to decide what is or is not necessary or relevant. Regarding the Supplemental interrogatories and 214 request served upon the respondent, I cannot formulate a judgement as to the adequacy of the answers provided since you have not produced any of the audio tapes or policies asked for or referenced by you in the answers. When can I expect the rest of the material asked for? In answer to supplemental interrogatory #5 you identify yourself as a person with knowledge of the facts, I assume you mean as the attorney for the respondent and not as a fact witness, if I am wrong please explain. I would like to get these matters resolved in advance of your vacation. Your "First Data Request To Complainant" is in preparation and will be forwarded shortly. The foregoing is intended as a 201k, attempt to resolve these discovery issues. Very truly yours, James H. Canel

Exhibit F